

Mail Stop 513

OCT 4 1978

Mr. G. N. Nelson  
SOHIO Petroleum Company  
Pouch 6-61Z  
Anchorage, Alaska 99502

Dear Mr. Nelson:

The Prevention of Significant Deterioration (PSD) permit application submitted by the Atlantic Richfield Company and the SOHIO Petroleum Company for new facilities in the Prudhoe Bay Oil Field has been reviewed by our technical staff. Before your application can be considered complete, additional information on the following items is required:

1. Physical Stack Height - Apparently the heights for many stacks that were used in the modeling were taken from engineering drawings and do not reflect the true height above the ground. Consideration of the total stack height above ground may result in reduced concentrations for the several hot spots identified in the modeling analysis. A discussion of the affect on the modeling results of using stack heights other than the actual stack heights is needed.

2. Plume Rise - The NSPS support document suggests that for gas turbines 70% of the normal Briggs plume rise should be used. The Company should discuss and defend the use of the full plume rise in their calculations or remodel using the 70% figure.

USEPA REG



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MMJOHNSTON:ps:10-2-78 (#6858A)

CONCURRENCES

SYMBOL	MMJohnston						
SURNAME							
DATE	OCT 3 1978						



If you have any questions regarding technical aspects of these points, please contact Robert Wilson at (206) 442-0887. Administrative questions should be directed to me at (206) 442-1387.

Sincerely,

Michael M. Johnston, Chief  
Air Compliance Evaluation Section

cc: Mr. Dave Estes, ADEC  
Mr. Bob Chivvis, EPA  
Mr. Charles Fahl, Dames and Moore  
Mr. P. B. Norgaard, ARCO  
Mr. R. V. Shafer, SOHIO